

August 16, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-NOP
1400 Independence Ave. SW
Room 4008 So., Ag Stop 0268
Washington, DC 20250
Email: National.List@usda.gov

Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program sunset review, Docket # TM-04-07.

Northland Organic Foods Corp. supports the continued approval of ALL of the substances, both synthetic and non-synthetic, that were previously approved in Article 205.601. Each of these substances was evaluated and approved, and plays an essential role in the production and/or processing of organic foods. To remove them from the approved list will make production of organic products much more difficult, and impossible in some cases, where there simply are not organic substitutes.

It is well documented that American consumers want additional organic products to be made available. However, the most common complaint and barrier to purchase is that organic products are too expensive. If the cost of production is made even higher by eliminating essential materials, this will only increase the cost to the consumer. This overregulation will effectively “slit the throat” of the organic industry. Maintaining the integrity of organic production is essential; however, this production is forced to take place in a less-than-perfect world. It is not possible to have an entirely purist production system that only a small handful of people is demanding and still provide the supply of healthy, organic food that the majority of consumers desire, at a price that everyone can afford. Putting organic farmers and processors out of business by eliminating necessary materials that have already been approved is counterproductive to what the organic industry has been trying to accomplish.

As the Crop Production Manager for Northland Organic Foods Corp., I am very concerned by the manner in which the sunset provision has been handled. Very few producers that I’ve spoken with had even heard of this potential change. They are too busy farming at this time of year! They rely on their certification agencies to inform them of any changes in organic regulations. But this action seems to have caught everyone by surprise. Not only has the comment time been dismayingly short, but the publicity of this critical issue has been so minimal that very few are aware of it. It has also been difficult to determine how and where the average producer should respond. How many farmers don’t have documentation readily at hand to cite in defense of materials that they use, so don’t respond at all? I’m sure this applies to a large percentage of farmers. Many organic producers are already discouraged by poor crop years and increasing expenses. A real danger is that this increased regulation will encourage some producers to simply give up, at a time when the industry needs even more farmers.

Rather than list individual products, Northland Organic Foods Corp. supports the continued approval of ALL materials listed in the sunset provision.

Sincerely,

Carolyn Lane

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